

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS CITRON, LLC
130 Clinton Road, Suite 202
Fairfield, New Jersey 07004
Telephone Number: 973-575-0707
Attorneys for Secured Creditor PHH MORTGAGE
CORPORATION

Harold Kaplan (HK0226)

In Re:

Josette M. Garrett,

Debtor,

Readus D. Garrett,

Joint Debtor.

Case No.: 17-21500-ABA

Chapter: 13

Hearing Date: July 28, 2020

Judge: Andrew B. Altenburg Jr.

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR
STAY RELIEF**

HEARING DATE AND TIME:
July 28,, 2020 at 10:00 a.m.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor(s)-</i> Josette M. Garrett 223 Swedes Run Drive Riverside, NJ 08075 <i>Joint Debtor-</i> Readus D. Garrett 223 Swedes Run Drive Riverside, NJ 08075	<i>Debtor's Attorney-</i> Brad J. Sadek Sadek and Cooper 1315 Walnut Street Ste 502 Philadelphia, PA 19107	<i>Trustee-</i> Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	<i>U.S. Trustee-</i> US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
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PLEASE TAKE NOTICE that on July 28, 2020, at 10:00 a.m., or as soon thereafter as counsel may be heard, RAS CITRON, LLC, attorneys for PHH MORTGAGE CORPORATION, the within creditor ("Creditor"), shall move before the Honorable Andrew B. Altenburg Jr., United States Bankruptcy Judge, at Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, N.J. 08101, Courtroom 4B, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay and Co-Debtor Stay pursuant to 11 U.S.C. §1301 (c) or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, U.S. Post Office and Courthouse, 401 Market Street, Camden, NJ 08101**, and simultaneously served on Secured Creditor's counsel, **RAS CITRON, LLC, 130 Clinton Road, Suite 202, Fairfield, New Jersey 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: 7/7/2020

RAS Citron, LLC

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By: /s/ Harold Kaplan

Harold Kaplan, Esquire

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